

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. No: 1:19-cv-11558-PBS

CATHERINE HARRIS,  
AS PERSONAL REPRESENTATIVE  
OF LARUSSIA Y. HARRIS  
Plaintiff,

v.

CITY OF BOSTON, JOHN DOE 1,  
JOHN DOE 2, TUFTS MEDICAL CENTER  
AND MATTHEW MOSTOFI, D.O.  
Defendants,

**MOTION OF THE DEFENDANTS, TUFTS MEDICAL CENTER AND MATTHEW  
MOSTOFI, D.O. TO TEMPORARILY TRANSFER THE CASE TO THE SUPERIOR  
COURT FOR THE CONVENING OF A MEDICAL MALPRACTICE TRIBUNAL**

Now come the Defendants, Tufts Medical Center and Matthew Mostofi, D.O. (the "Defendants"), by and through counsel, and respectfully request this Honorable Court grant the Motion of the Defendants to Temporarily Transfer the Case to the Superior Court for the Convening of a Medical Malpractice Tribunal. Grounds in support of this Motion are set forth below:

**STATEMENT OF THE CASE**

This is a medical malpractice action in which the Plaintiff, Catherine Harris, as Personal Representative of the Estate of Larussia Y. Harris (the "Plaintiff"), alleges that the Defendants were negligent in their medical care and treatment of the Plaintiff's Decedent ("Ms. Harris") on May 15, 2016. The Plaintiff alleges that as the direct result of the Defendants' failure to properly evaluate and treat Ms. Harris in the Emergency Department, she died May 16, 2016. The Defendants maintain that their care and treatment of Ms. Harris complied with the standard of

10/18/19  
The parties shall  
inform the court whether  
there is diversity of  
citizenship. Paul & Sai